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Attorneys for Plaintiffs
WINGSAIL HOLDINGS, LLC and
YUNFEI “KRISTY” BAI

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

WINGSAIL HOLDINGS, LLC, a Washington Corporation, and YUNFEI “KRISTY” BAI, an individual,)	Case No.: 8:23-CV-02398-JWH-DFM
Plaintiffs,)	PLAINTIFFS’ EX PARTE
)	APPLICATION TO CONTINUE
)	TRIAL AND RELATED DATES AND
)	DEADLINES
vs.)	
ANDREW POLSKY, an individual, and)	
SEFED, a California Corporation, and)	
DOES 1 through 10,)	
Defendants.)	

TO THIS HONORABLE COURT AND TO DEFENDANTS AND THEIR
COUNSEL OF RECORD:

Plaintiff WINGSAIL HOLDINGS, LLC and YUNFEI “KRISTY” BAI
hereby submit this ex parte application to continue the presently-scheduled trial
date of December 1, 2025, to mid-March of 2026, and to extend all related dates
and deadlines pursuant to Federal Rules of Civil Procedure, Rule 16(b)(4) and
United States District Court, Central District of California, Local Rule 7-19.
Plaintiffs believe good cause exists for this requested trial continuance and
extension of related dates and deadlines for the following reasons:

- Defendants have moved to dismiss Plaintiffs’ Second Amended

1 Complaint, and the Court took that motion under submission on
2 February 25, 2025. The Court has not yet issued a decision on that
3 motion and, therefore, Defendants have not filed an answer to the
4 Second Amended Complaint and as a result Plaintiffs have not been
5 given a reasonable opportunity to conduct discovery as to any denials,
6 affirmative defenses, and/or any other new matter that may be raised
7 in the answer. The present discovery deadline of July 25, 2025, in fact
8 gives them no opportunity to conduct such discovery.

- 9 • Plaintiffs have recently changed attorneys, with new counsel
10 substituting in as counsel of record on May 21, 2025. New counsel is
11 of the opinion that some additional discovery needs to be conducted in
12 the form of document requests to Defendants and two to three
13 depositions of percipient witnesses, and the currently-scheduled
14 deadline of July 25, 2025 will not afford a reasonable opportunity to
15 complete that discovery.
- 16 • New counsel for Plaintiffs currently already has trial scheduled the
17 first half of December in a case pending in Los Angeles County
18 Superior Court that is up against the five-year deadline to bring the
19 case to trial, so the likelihood that trial will commence at that time is
20 great.

21 For those reasons, Plaintiffs respectfully request a three and one-half month
22 continuance of the trial date and extension of related trial dates and deadlines.

23 Counsel for Plaintiffs and counsel for Defendants met and conferred about
24 the request Plaintiffs are making herein, but were unable to reach an agreement.

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(See Buus Declaration, ¶ 7, Exhibit “A.”) As such, Plaintiffs expect Defendants to oppose this ex parte application.

Respectfully submitted,

Dated: July 14, 2025

BUUS LAW GROUP APC

/s/ William L. Buus

By: William L. Buus
Counsel for Plaintiffs
WINGSAIL HOLDINGS, LLC and
YUNFEI “KRISTY” BAI

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is that of 3 Pointe Drive, Suite 110, Brea, California 92821.

I hereby certify that on July 14, 2025, I electronically filed the foregoing PLAINTIFFS' EX PARTE APPLICATION TO CONTINUE TRIAL AND RELATED DATES AND DEADLINES with the Clerk of the Court using ECF which will send notification and a copy of such filing to the following persons:

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Attorneys for Defendants ANDREW POLSKY and SEFED

Executed on July 14, 2025, at Brea, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ William L. Buus